RSA-227 - Annual Client Assistance Program (CAP) Report

Indiana (INDIANA P and A SERVICES) - H161A130015 - FY2013

General Information

Designated Agency Identification

Name	Indiana Protection and Advocacy Services
Address	4701 N. Keystone Ave.
Address Line 2	Suite 222
City	Indianapolis
State	Indiana
Zip Code	46205
E-mail Address	

Website Address	http://www.in.gov/ipas
Phone	317-722-5555
TTY	317-722-5563
Toll-free Phone	1-800-622-4845
Toll-free TTY	1-800-838-1131
Fax	317-722-5564

Operating Agency (if different from Designated Agency)

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Additional Information

Name of CAP Director/Coordinator	Catharine Wingard
Person to contact regarding report	Catharine Wingard

Contact Person Phone	(317) 722-3469

Part I. Agency Workload Data

A. Information and Referral Services (I&R)

Multiple responses are not permitted.

Information regarding the Rehabilitation Act	84
2. Information regarding Title I of the ADA	0
3. Other information provided	68
4. Total I&R services provided (Lines A1+A2+A3)	152
5. Individuals attending trainings by CAP staff (approximate)	105

B. Individuals served

An individual is counted only once during a fiscal year. Multiple counts are not permitted for Lines B1-B3.

1. Individuals who are still being served as of October 1 (carryover from prior year)	13
2. Additional individuals who were served during the year	50

3. Total individuals served (Lines B1+B2)	63
4. Individuals (from Line B3) who had multiple case files opened/closed this situations, an individual may have more than one case file opened/closed duri number is not added to the total in Line B3 above.)	* `

C. Individual still being served as of September 30

Carryover to next year. This total may not exceed Line I.B3. 13

D. Reasons for closing individuals' case files

Choose one primary reason for closing each case file. There may be more case files than the total number of individuals served to account for those unusual situations, referred to in Line I.B4, when an individual had multiple case files closed during the year.

1. All issues resolved in individual's favor	10
2. Some issues resolved in individual's favor (when there are multiple issues)	5
3. CAP determines VR agency position/decision was appropriate for the individual	6
4. Individual's case lacks legal merit; (inappropriate for CAP intervention)	17
5. Individual chose alternative representation	0

6. Individual decided not to pursue resolution	9
7. Appeals were unsuccessful	0
8. CAP services not needed due to individual's death, relocation, etc.	0
9. Individual refused to cooperate with CAP	6
10. CAP unable to take case due to lack of resources	0
11. Other (please explain)	

N/A

E. Results achieved for individuals

1. Controlling law/policy explained to individual	29
2. Application for services completed.	0
3. Eligibility determination expedited	0

4. Individual participated in evaluation					
5. IPE developed/implemented	7				
6. Communication re-established between individual and other party	7				
7. Individual assigned to new counselor/office	3				
8. Alternative resources identified for individual	1				
9. ADA/504/EEO/OCR/ complaint made	0				
10. Other	6				
11. Other (please explain)					

In each case the client chose to self advocate on their own behalf and refused services from CAP

Part II. Program Data

A. Age

As of the beginning of the fiscal year. Multiple responses are not permitted.

1. 21 and under	8
2. 22 - 40	18
3. 41 - 64	30
4. 65 and over	7
5. Total (Sum of Lines A1 through A4. Total must equal Line I.B3.)	63

B. Gender

Multiple responses not permitted.

1. Female	30
2. Male	33
3. Total (Sum of Lines B1 and B2. Total must equal Line I.B3.)	63

C. Race/ethnicity

1. Hispanic/Latino of any race	1
For individuals who are non-Hispanic/Latino only	
2. American Indian or Alaskan Native	0
3. Asian	0
4. Black or African American	16
5. Native Hawaiian or Other Pacific Islander	0
6. White	45
7. Two or more races	1
8. Race/ethnicity unknown	0

D. Primary disabling condition of individuals served

Multiple responses not permitted.

1. Blindness (both eyes)	1
2. Other visual impairments	4
3. Deafness	3
4. Hard of hearing	10
5. Deaf-blind	0
6. Orthopedic impairments	12
7. Absense of extremities	0
8. Mental illness	8
9. Substance abuse (alcohol or drugs)	0
10. Mental retardation	3

11. Specific learning disabilities (SLD)	13
12. Neurological disorders	0
13. Respiratory disorders	0
14. Heart and other circulatory conditions	0
15. Digestive disorders	0
16. Genitourinary conditions	0
17. Speech Impairments	0
18. AIDS/HIV positive	0
19. Traumatic brain injury (TBI)	0
20. All other disabilities	9

21. Disabilities not known	0	
22. Total (Sum of Lines D1 through D21. Total must equal Line I. B3.)	63	

E. Types of individuals served

Multiple responses permitted.

1. Applicants of VR Program	18
2. Clients of VR Program	45
3. Applicants or clients of IL Program	0
4. Applicants or clients of other programs and projects funded under the Act	0

F. Source of individual's concern

Multiple responses permitted.

1. VR agency only	63
2. Other Rehabilitation Act sources only	0

3. Both VR agency and other Rehabilitation Act	sources 0
4. Employer	0

G. Problem areas

Multiple responses permitted.

1. Individual requests information	0
2. Communication problems between individual and counselor	1
3. Conflict about services to be provided	47
4. Related to application/eligibility process	11
5. Related to IPE development/implementation	4
6. Other Rehabilitation Act-related problems	1
7. Non-Rehabilitation Act related	0

8	Related	to	Title	Lof	the	ADA
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H. Types of CAP services provided

Choose one primary CAP service provided for each case file/service record.

1. Information/referral	3
2. Advisory/interpretational	41
3. Negotiation	5
4. Administrative/informal review	0
5. Alternative dispute resolution	3
6. Formal appeal/fair hearing	1
7. Legal remedy	0
8. Transportation	0

Part III. Narrative

Narrative

a. Type of agency used to administer CAP:

Indiana Protection and Advocacy Services is an external protection and advocacy agency.

b. Sources of funds expended: federal

Source of funding Total expenditures spent on individuals:

Federal funds: \$263,915

State Funds -0-

All other funds-0-

Total from all sources: \$263,915

c. Budget for current and following fiscal years:

The IPAS budget for the current and subsequent fiscal years.

Category Current Fiscal Year Next Fiscal Year

Wages & Salaries \$137,280 \$106,619

Fringe Benefits \$74,429 \$57,805

Materials/Supplies \$5,740 \$4,458

External Services \$27,520 \$21,373

Travel \$6,883 \$5,346

Equipment Rental/Purchase \$3,392 \$2,634

Other \$8671 \$6,734

Total Budget \$263,915 \$204,970

d.Professional 2.668 100%

Full-time

Part-time N/A

Vacant N/A

Clerical .232 100%

Full-time N/A

Part-time N/A

Vacant N/A

e. Summary of presentations made:

Fourteen presentations reaching over 100 individuals were completed during fiscal year 2013. Twelve exhibits reaching more than 30,000 individuals were completed during fiscal year 2013. These presentations and exhibits were designed to reach newly hired Vocational Rehabilitation Counselors, staff of State Independent Living Centers, transitioning youth, underserved populations, individuals with traumatic brain injury, and service providers who serve people with disabilities. CAP staff completed the following presentations (attendee numbers are in parenthesis):

PRESENTATIONS:

CAP Overview for Columbus Indiana Vocational Rehabilitation Services Counselors

05/28/2013 7

CAP Overview for Lafayette Indiana Vocational Rehabilitation Services Counselors

05/20/2013 8

CAP Overview for Richmond Indiana Center for Independent Living

06/27/2013 8

CAP Overview for Richmond Indiana Vocational Rehabilitation Services Counselors

05/20/2013 8

CAP Overview for Shadeland Indiana Vocational Rehabilitation Services Counselors

05/24/2013 10

CAP Overview for Bloomington Indiana Vocational Rehabilitation Services Counselors

08/13/2013 6

CAP Overview for Clarksville Indiana Vocational Rehabilitation Services Counselors

08/26/2013 9

CAP Overview for Evansville Indiana Vocational Rehabilitation Services Counselors

08/30/2013 8

CAP Overview for Huntingburg Indiana Vocational Rehabilitation Services Counselors

08/23/2013 7

CAP Overview for Terre Haute Indiana Vocational Rehabilitation Services Counselors

09/09/2013 10

CAP Overview for Vincennes Indiana Vocational Rehabilitation Services Counselors

09/27/2013 7

CAP Training at Bosma Enterprises (serving individuals who are visually impaired or blind)

10/01/2012 9

CAP Overview Terre Haute ILCEIN Center (Independent Living Center)

09/09/2013 8

CAP Overview for Richmond Center on Independent Living

06/27/2013 8

EXIHIBITS:

Westside Secondary Transition Council Transition Fair 2012

10/29/2012 100

Bartholomew County School Corporation Transition Fair 2012

11/13/2012 200

Transition Partners of NE Indiana

03/21/2013 150

Jackson County Transition Fair 2013

04/9/2013 100

Monroe/Owen County Transition Fair 2013

04/3/2103 100

Greensburg (Decatur Co.) Transition Fair 2013

04/5/2103 100

Floyd County/New Albany Transition Fair 2013

03/22/13 200

Scott County Transition Fair 2013

03/15/2013 100

Zionsville Community High School Transition Fair

3/15/2013 150

INARF (Indiana Association of Rehabilitation Facilities) Conference 2013

03/14/2013 300

BIAI (Brain Injury Association of Indiana) Conference 2013

09/12/2013 300

Perry Township Transition Carnival

09/19/2013 30,000

In addition to the listed presentations and exhibits, the following numbers of informational brochures and newsletters were distributed:

CAP Brochure 1380

Developmental Disability Network Brochure 630

IMPACT Newsletter - Annual Report 170

IMPACT (agency-wide priorities and objectives) Newsletter 1656

IPAS Agency Booklet 125

IPAS Agency Brochure 2427

Segregated and Exploited: The Failure of the Disability Service System to Provide Quality Work (National Disability Rights Network publication) 499

Toll free Resource Guide 1580

Transition Planning Handbook 1196

Total number of brochures/newsletters: 9663

f. Involvement with advisory boards:

Indiana's Commission on Rehabilitation Services is the advisory board for Indiana Vocational Rehabilitation (VR) Services, which serves thousands of citizens with disabilities each year through vocational rehabilitation, employment, education and independent living in the community. The CAP Coordinator participates as a member of the Indiana Commission and serves as the Chairperson for the subcommittee known as the Policy, Oversight, Planning and Evaluation Committee. This subcommittee consults with VR on the development, implementation, and revision of State policies and procedures pertaining to the provision of vocational rehabilitation services; reviews appeals; advises VR on eligibility criteria, the scope and effectiveness of VR services and activities, and the functions that affect individual employment outcomes. The committee's purpose relates to the implementation of policies and procedures rather than day-to-day management of the programs and involves researching issues brought before the Commission.

The 2014 VR State Plan was presented to the Commission for comment. The oversight committee has discussed the large number of VRS appeals involving the denial of hearing aids and lack of the use of mediation when disputes arise between counselor and applicant or eligible client. The VRS administration reported that all the revisions to the current policy have been completed and submitted to field staff for comment. Some policy chapters were reformatted to include federal regulation references and citations via hyper links on the VR website. VR has informed the Commission that it intends to continue efforts of reviewing policies involving youth "transition" services, the small business enterprise program, eligibility, supported employment, post secondary service, vehicle modifications, home modifications, and the provision of hearing aids. CAP Advocates and IPAS legal will be assigned to VR workgroups in the upcoming year to offer comment and recommendations with regard to these specific policies. The Commission was introduced this year to the newly appointed Division of Disability and Rehabilitative Services (DDRS) Director, and to the newly appointed VR Director.

VR provided for public comment on final policy revisions in December 2012. The revisions were minor and were provided to the IPAS Legal Director for review and comment. There were no other proposed changes or revisions to VR policy during the fiscal year. The IPAS legal team continues their collaboration with Indiana Civil Rights Commission to assure that the VR policies and procedures that are in place are promulgated to meet all requirements of the Administrative Rules and Procedures Act (ARPA).

A CAP Advocate serves as a member of the Indiana Council on Independent Living (ICOIL). IPAS provided input into the review and revisions of the Statewide Plan for Independent Living (SPIL). ICOIL continues to work on adding members to the Council, participating in disability-related events, increasing legislators' awareness of disability issues and developing plans for new Centers for Independent Living. During the year, IPAS participated in eight of the twelve monthly meetings of ICOIL. A primary focus of many of the ICOIL meetings was the development, revision and approval of the 2014 State Plan for Independent Living (SPIL). During the year, the Council also was introduced to newly appointed Division Director, the new Vocational Rehabilitation Services Director and the new Client Assistant Program Coordinator. IPAS continues to encourage Independent Living Centers, via ongoing outreach, to refer clients to IPAS for legal and advocacy services.

The CAP program is also represented with membership on the Indiana Brain Injury Association's Leadership Board.

g. Outreach to unserved/underserved populations:

IPAS created an outreach project in 2009 in an effort to reach the youth of the State who are enrolled in special education services, who are preparing to

transition from secondary school to employment or college, and provide them with information about disability rights, the resources available, and important time frames for this transition. This project has continued through this fiscal year.

During 2013, eleven school corporations/special education cooperatives were contacted and asked if they would be interested in receiving, free of charge, copies of the IPAS "Transition Guide-A Handbook for Parents" publication to distribute to their students and families. Each school system was receptive and 1,195 handbooks were distributed. The handbook was also distributed at multiple events throughout the year including the 2013 Vision Expo, the Indiana Brain Injury Association Annual Conference and at the Back to School Carnival in Indianapolis. This outreach ensures that information about IPAS services and the transition process are available to individuals with disabilities, their families and professionals who are in need of advocacy services.

h. Alternative dispute resolutions:

Statistics for FY 2013 indicate that Indiana CAP opened twenty-one service requests involving some form of alternative dispute resolution. Below is a narrative that best reflects our continuing efforts to mediate on behalf of our callers/clients:

Case Example:

IPAS opened this case in December 2012 at the request of a caller who reported that she was appealing an eligibility decision made by the Vocational Rehabilitation (VR) office. "Eileen" had been found ineligible for VR services based on the fact that VR did not believe that she had impairment that would cause a substantial impediment to employment. She decided to appeal this decision and asked IPAS for assistance through the appeal process. During the course of the CAP fact finding, the advocate learned that the applicant had not returned the appeal request paperwork to VR in a timely manner per the VR policy appeal time frames. IPAS informed her that her right to appeal had lapsed due to her not returning timely paperwork to VR. However, during the course of conversation with the client, the advocate learned that Eileen had suffered a brain injury during childhood. Since the advocate had not seen any reference to this in the VR assessment documentation, she spoke to the VR Counselor about the need for assessing this possible impairment that may have contributed to the problem with getting her paperwork back to VR in a timely manner. VR agreed to conduct further assessment. While IPAS did not represent the caller at hearing as the appeal time frame had lapsed, the original dispute in regards to eligibility was addressed in an alternative manner. VR agreed to send the client for neuropsychological testing to determine if the brain injury was an impairment that would qualify her for their services. The advocate was unable to identify a rights violation but did identify a need for further assessment of this woman's capacities and abilities and impairment.

In addition, there were fifteen cases involving consumer requests for CAP representation at administrative hearings that were later withdrawn by the consumer due to CAP involvement. Less formal methods of resolution occurred in cases regarding eligibility determination, service provision, and choice. CAP advocates explained controlling law and policy to seven individuals and negotiated resolutions with the VR offices in two instances. Four individuals were offered and provided CAP legal representation.

i. Systemic advocacy:

Judicial Review Petition: IPAS is representing a client in his appeal of the denial of educational financial assistance by Vocational Rehabilitation Services (VRS). VRS adopted a new process and calculation for determining the upper limit of financial assistance/need for post-secondary educational expenses in late 2011 without issuance of a new or amended policy or procedure. The primary argument in the case is that the Policy and Procedure Manual (PPM) used by VRS meets the Indiana common law definition of a "rule"; is subject to the "Administrative Rules and Procedures Act" (ARPA), and its rule promulgation provisions; that the PPM has not been promulgated; and therefore under ARPA, the PPM is void according to law. After consultation with this client, and another IPAS client that has a pending judicial review petition for denial of replacement hearing aids, IPAS counsel initiated a collaborative effort with the American Civil Liberties Union (ACLU). IPAS and ACLU counsel agreed that the best way to address the issue of the lack of promulgation of the PPM was to file a class action to ask that the VRS PPM be declared void under ARPA. The parties have continued throughout the quarter to negotiate terms for settlement of the case including, time frames for promulgation; entering into an informal, non binding agreement of settlement terms between the parties to be filed with the Court in support of suspending the action while promulgation occurs; and the terms to be included to a notice to be sent to the class regarding the proposed settlement. If settlement is reached, it will include providing the client the specific relief he has requested (i.e. reimbursement of books and tuition for the semester represented by this appeal).

Administrative Hearing: IPAS has agreed to represent the client in the above case in a separate appeal on the same issue involving denial of educational assistance (tuition and books) for the Fall 2013 semester. The administrative hearing in this case has been indefinitely continued pending resolution of the class action addressing promulgation of the Vocational Rehabilitation Services Policy and Procedure Manual, and to consolidate the appeal related to the anticipated denial of educational assistance for the Spring 2014 semester with this appeal, as the issues in both denials are identical. FSSA/VRS declined to settle these issues along the same lines as is proposed in the above case. This consolidation will reduce unnecessary, duplicative litigation.

Judicial Review Petition: IPAS is representing a client in the judicial review of Vocational Rehabilitation Services (VRS) denial of replacement hearing aids. The Administrative Law Judge determined that the client did not qualify for replacement hearing aids because the client did not have a substantially revised prescription, the client continues to have the same job duties, and is not being threatened with job loss. The client's initial judicial review petition resulted in the case being remanded to VRS, and subsequently VRS and the agency again denied the client's requested services. A second judicial review petition was filed and is now pending, and the record from the second administrative denial has been filed with the Court. After consultation with the client and another IPAS client that has a pending judicial review petition for denial of post-secondary educational assistance, IPAS counsel initiated a collaborative effort with the American Civil Liberties Union (ACLU). IPAS and ACLU counsel agreed that the best way to address the issue of the lack of promulgation of the PPM was to file a class action to ask that the VRS PPM be declared void under ARPA. The parties have continued throughout the quarter to negotiate terms for settlement of the class action including time frames for promulgation; entering into an informal, nonbinding agreement of settlement terms between the parties to be filed with the Court in support of suspending the action while promulgation occurs; and the terms to be included in a notice to be sent to the class regarding the proposed settlement. Shortly after the end of the quarter, the client confirmed that she did receive the hearing aids she had requested and that they have greatly improved her ability to hear, thus helping to secure her job. The client's judicial review case will remain open as it is the cause under which the class action against VRS for promulgation of its policies was filed, and through which any agreement will be monitored until promulgation is completed.

Judicial Review Petition: Indiana Protection and Advocacy Services (IPAS) is representing a client in the judicial review of denial of services by Vocational Rehabilitation Services (VRS). The client initially appealed a decision by VRS through which he was denied funding for hearing aids. VRS decided that the client's hearing loss was not substantial enough to qualify for VRS assistance. After the client received a favorable decision through the administrative hearing process, the ultimate authority at the Division of Disability and Rehabilitation Services (DDRS) reversed the hearing officer's decision and denied the client's request for hearing aids. A hearing on the matter was held on January 17, 2013. IPAS contended that the agency review request failed to cite the issues with reasonable particularity and that the administrative review decision failed to cite clear and convincing evidence, as required by the review standards. The Court found in favor of IPAS' client at judicial review. The Judge found that the State had not issued a legally sufficient decision at the administrative review stage. Upon remand, further information was provided to VRS, which has now agreed to provide the client the hearing aids for which he originally applied. This result resolves the only issue in the case, and it will be closed when it is confirmed that the client has received the hearing aids.

Administrative Hearing: IPAS represented a client in an administrative hearing challenging the denial of requested services by VRS in the form of funding for post-secondary education. VRS initially provided post-secondary financial educational assistance, but did then later change its policy such that the client received no educational funding support. IPAS represented the client at the hearing and argued that VR could not impose any financial means test on our client based on the fact that he is a recipient of a Social Security benefits and the federal VRS regulations prohibit application of a financial means test against Social Security recipients, and that the financial means test that they did use violated the federal regulations because it effectively denied its clients the ability to obtain funding for post secondary education. The Administrative Law Judge's decision held that VRS violated the federal regulations that prohibit application of financial means testing against recipients of Social Security, and ordered the funding to be restored to previous levels. VRS did not file a request for agency review.

k. On-line information/outreach:

On-line information:

The IPAS website, www.in.gov/ipas, received 99,769 hits during the past fiscal year. This is a 28% increase over the same period during last fiscal year. Page views totaled 97, 560, an increase of 29% over last year. Webpage visits totaled 62,579 which is 43% increase over last year and web site visitors totaled 57,615 which is 43% more than last year. Visitor numbers from Indiana were 10, 485, an increase of 122% compared to the same time last year. IPAS is also on social media websites Facebook and Twitter and continues to develop further electronic outreach modalities including a newly launched monthly E-newsletter.

Outreach:

The Client Assistance Program assisted 63 individuals this year. The majority of callers were clients of VR as opposed to applicants. Of these, fifteen issues reported to CAP were resolved or partially resolved and seventeen were found to not have merit. Problems reported by callers included conflicts with counselors about particular VR services, application and eligibility determination disputes, and lack of employment plan development. Case outcomes for these individuals, as a result of CAP advocacy included providing information to the caller about state and federal controlling law/policy, assisting in employment plan development and implementation, reestablishing communication between the VR counselor and the client, and choosing a new VR counselor.

CAP intake specialists and advocates also provide each caller with a satisfaction survey at the time of case closure. These questionnaires provide the consumer with an opportunity to comment about CAP services. Four individuals completed and returned surveys this year. Responses indicated a 75% satisfaction rating for

CAP services received. Also, of the eighty-eight individuals who contacted CAP for information and referral services, 24 individuals were re-contacted by phone and asked about their satisfaction with the information provided. 100% of those contacted indicated that they thought the information they received was helpful and that they would call IPAS again if they had another disability rights question.

j. Interesting cases:

The following four cases provide a summary of the variety of ways that Indiana CAP assisted people in resolving issues as they sought employment services through Indiana Vocational Rehabilitation:

"Pauline" requested that IPAS review Indiana Vocational Rehabilitation Services' (VRS) decision to close her case. VRS had evaluated her employment skills and determined that her disability was too severe for her to be employed. Pauline disagreed with the results of the initial assessment. IPAS determined that Pauline had multiple health issues, and agreed with Pauline that with the appropriate accommodations in the workplace, she may be able to obtain/maintain employment. With IPAS involvement, Pauline decided to reapply for VR services and to participate in another community-based evaluation, with an agency of her choice, to determine if she could benefit from VR services.

"Dennis" contacted IPAS for assistance with developing an Individualized Plan for Employment (IPE) with VRS that reflected his choice in terms of his employment goal. He wanted to receive training and obtain a Commercial Drivers' License (CDL) to become a truck driver but VRS did not believe that this was an appropriate employment goal as Dennis' disability would not allow him to meet the physical demands of the job. IPAS successfully advocated for VRS to obtain necessary medical information to support this decision. VRS then obtained medical documentation that did show that he was capable of performing the tasks of that job. VRS assessed the new medical information and agreed to amend Dennis' IPE to reflect his choice in employment outcome so he could receive CDL training.

One service request involved "Sandy" who applied for VRS services and later contacted IPAS to assist her with an appeal of a VRS ineligibility decision. Sandy had a learning disability and had received special education services in high school. Sandy sought VRS assistance in finding employment. Her VR counselor said she did not qualify for VR services. IPAS reviewed the facts of the case and found that the applicant met the eligibility requirements. IPAS spoke to the VRS Supervisor about her findings and the Supervisor overturned the counselor's decision and found the client eligible for rehabilitation services. VRS developed an Individualized Plan for Employment and provided the services necessary for Sandy to become employed.

"Everett" contacted IPAS because VRS closed his case after he failed to obtain his employment goal during the time frame that had been established in his plan. IPAS fact-finding revealed that after the client contacted IPAS, the VRS Supervisor decided to reverse the Counselor's decision to close Everett's case. VRS decided that they needed to obtain additional assessments with regard to the client's vocational strengths, resources, concerns, abilities, capabilities, priorities and career interests. Based on these assessments, Everett and VRS agreed to explore new career options and to develop a new plan for employment.

Certification

Approved

This Report is Complete and Correct.	Yes
Date Signed:	15-Nov-13
Name of Designated Agency Official:	Indiana Protection and Advocacy Services
Title of Designated Agency Official:	Assistant Director of Client Services

System Information

System information

The following information is captured by the MIS.

This form has been approved for use by OMB through Jun 30, 2014.

Last updated on	11/15/2013 12:48 PM
Last updated by	
Completed on	11/15/2013 12:48 PM
Completed by	capinwingardc
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Approved by	
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